

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE NATIONAL NEWSPAPER ASSOCIATION WITNESS SPEIGHTS
(USPS/NNA-T2—1-11)

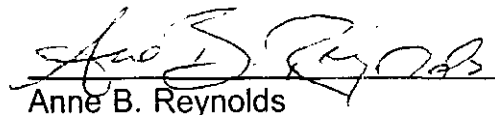
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the National Newspaper Association witness Speights: USPS/NNA-T2—1-11.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anne B. Reynolds

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January 28, 1998

USPS/NNA-T2-1. Please explain how you came to testify on behalf of National Newspaper Association. Did you volunteer? Were you selected from a group of volunteers? Please explain fully.

USPS/NNA-T2-2. Please provide some details about Prentiss.

- a. Is it incorporated? Who provides local government and services?
- b. What is the population in town? Nearby?
- c. What types of manufacturing and industrial jobs are available in the area?
- d. To what extent is it typical or atypical of the rest of Mississippi? Please identify all bases on which you rely in formulating your opinion.
- e. To what extent is it typical or atypical of the rest of the United States? Please identify all bases on which you rely in formulating your opinion.

USPS/NNA-T2-3. Please provide some details about the *Prentiss Headlight*.

- a. How have circulation and the percentage of advertising varied during the last three years?
- b. With what other publications does it compete for circulation? For each publication identified, please provide its frequency of publication and approximate circulation, to the best of your knowledge.
- c. Are you aware of any other publications that enter copies into the mail at the Prentiss Post Office using in-county rates? If so, please identify them and your best understanding of their frequency of publication and approximate circulation.

USPS/NNA-T2-4. Please confirm that with respect to the "one-time" experience described on pages 3-4 of your testimony that you received two telephone calls from the Postal Service bringing the matter to your attention.

USPS/NNA-T2-5. On page 5, line 14, you state you believe the "New Hebron situation" is one faced by many small town publishers. Please state the basis for your belief. Did you conduct a study? Have you anecdotal evidence of other examples? Please explain fully.

USPS/NNA-T2-6. On page 6, lines 17-18, you refer to your newspaper's annual postage bill by referring to postage incurred for both the newspaper and a "weekly shopper".

- a. Please provide a breakdown of the postal expenditures by pieces and postage as between the newspaper itself and the weekly shopper.
- b. In what subclass(es) and category(ies) of mail is the weekly shopper entered?

USPS/NNA-T2-7. Beginning on line 23 of page 6 and ending on the first line of page 7, you indicate that at one time virtually all copies of the newspaper “would have been mail-delivered.”

- a. By this do you mean that the copies once were virtually all delivered by mail, or that they would have been if an appropriate combination of mail category and service had ever been offered?
- b. To what time period does the quoted statement apply?

USPS/NNA-T2-8. Referring to page 7, line 1 of your testimony, why is carrier delivery not “possible” for copies delivered just out of town?

USPS/NNA-T2-9. Please estimate the percentage of the circulation of the Prentiss Headlight that is carrier route presorted.

USPS/NNA-T2-10. Please explain why you cannot enter the *Prentiss Headlight* by

- a. establishing additional entry at New Hebron; or
- b. by using plant verified drop shipment.

USPS/NNA-T2-11. How is your mail verified at New Hebron?

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Anne B. Reynolds

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